

SEP 22 2021

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
CASE NO. 3:21-cr-234-FDW

US DISTRICT COURT  
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA	)	<b><u>BILL OF INDICTMENT</u></b>
	)	
v.	)	
	)	Violations: 18 U.S.C. § 1425(a)
GREGORY MAXWELL PALMER	)	18 U.S.C. § 1542
_____	)	

**THE GRAND JURY CHARGES:**

At the specified times and at all relevant times:

**INTRODUCTION**

1. On or about June 17, 2008, in Gaston County, defendant Gregory Maxwell Palmer ("PALMER") committed sexual crimes against a minor victim. Palmer was later charged with statutory rape and indecent liberties with a child, and he was eventually convicted of attempted statutory rape/sex offense.
2. On or about May 5, 2011, in Gaston County, North Carolina, PALMER signed and subsequently submitted Form N-400 (Application for Naturalization) to U.S. Citizenship and Immigration Services (CIS). Question 15 of the N-400 asked, "Have you ever committed a crime or offense for which you were not arrested?" PALMER checked the box corresponding with "No." Part 11 of the N-400 contains the applicant's certification and signature block. The text immediately above the block reads "I certify, under penalty of perjury under the laws of the United States of America, that this application, and the evidence submitted with it, are all true and correct."
3. On or about October 5, 2011, in Charlotte, North Carolina, PALMER appeared in person at the CIS office for a naturalization interview. At the beginning of the interview, a CIS officer placed PALMER under oath and reviewed with him his responses on the N-400. During the interview, PALMER swore under oath that his responses on the N-400 were all true and correct. At the conclusion of the interview, PALMER signed Part 13 of the naturalization application in the presence of the officer and swore under penalty of perjury that the contents of his application were all true and correct.
4. On October 20, 2011, in Charlotte, North Carolina, PALMER appeared in person at the CIS office. PALMER participated in a naturalization ceremony and, based on his N-400, PALMER was granted U.S. citizenship. PALMER also received a Form N-550 (Certificate

5. On October 28, 2011, in Gaston County, North Carolina, Palmer signed a Form DS-11 (Application for a U.S. Passport) and submitted it to the U.S. Department of State. As evidence of citizenship and eligibility, he submitted his Certificate of Naturalization. The text above the signature block of the DS-11 read in part "I declare under penalty of perjury...I have not knowingly and willfully made false statements or included false documents in support of this application."
6. On November 3, 2011, the State Department issued a United States passport to Palmer.
7. On December 13, 2012, in Gaston County, North Carolina, local law enforcement authorities arrested and charged him with several counts of indecent liberties with a child and statutory rape.
8. On February 25, 2013, in Gaston County Superior Court, a felony information was filed and charged with attempted statutory rape/sex offense. According to this information, the victim was a 13-year-old child and the offense date was June 17, 2008.
9. On June 6, 2013, Palmer was convicted of attempted statutory rape/sex offense. The judge sentenced him to an aggravated term of imprisonment of between 157 and 198 months because Palmer had taken advantage of a position of trust in committing the offense.

#### **COUNT ONE—NATURALIZATION FRAUD**

10. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 9 of the Bill of Indictment, and further alleges that:
11. On or about October 20, 2011, in Mecklenburg County, within the Western District of North Carolina, and elsewhere, the defendant,

#### **GREGORY MAXWELL PALMER**

knowingly procured, contrary to law, his naturalization and United States citizenship, that is, in his Application For Naturalization (N-400) to become a United States citizen, he provided false and fraudulent information as to material facts about his criminal history by falsely representing that he had not committed a crime or offense for which he was not arrested.

In violation of Title 18, United States Code, Section 1425(a).

**COUNT TWO—PASSPORT FRAUD**

12. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 1 through 10 of the Bill of Indictment, and further alleges that:
13. On or about October 28, 2011, in Gaston County, within the Western District of North Carolina, and elsewhere, the defendant,

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willfully and knowingly did and attempted to make a false statement in a passport application with the intent to induce and secure the issuance of a passport under the authority of the United States, either for his own use and the use of another, contrary to the laws regulating the issuance of passports or the rules prescribed pursuant to such laws, that is, including false and fraudulent documents with his passport application.

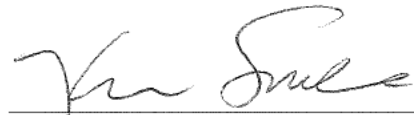
In violation of Title 18, United States Code, Section 1542.

A TRUE BILL:



FOREPERSON

WILLIAM T. STETZER  
ACTING UNITED STATES ATTORNEY



KENNETH M. SMITH  
ASSISTANT UNITED STATES ATTORNEY